

THE HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

v.

JACKSONS FOOD STORES, INC.

Defendant.

CIVIL ACTION NO. 2:17-cv-01285-TSZ

STIPULATION TO MODIFY
PRETRIAL DEADLINES PERTAINING
TO EXPERTS

NOTE ON MOTION CALENDAR:
June 11, 2018

The EEOC and Jacksons Food Stores, Inc. (collectively "the parties") jointly stipulate and move to extend certain pretrial discovery and case management deadlines pertaining to experts as described herein.

A. Relief Sought

The parties have conferred and, subject to Court approval, hereby move to extend certain pretrial discovery and case management deadlines pertaining to experts as set forth in docket no. 8. The parties do not seek modification of the February 4, 2019 trial date. The parties jointly move to extend the following pretrial deadlines:

STIP. TO MODIFY EXPERT DEADLINES
2:17-cv-01285-TSZ
Page 1 of 4

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION
909 First Avenue, Suite 400
Seattle, Washington 98104-1061
Telephone: (206) 220-6883
Facsimile: (206) 220-6911
TDD: (206) 220-6882

1 Disclosure of expert testimony under FRCP 26(a)(2): Each party shall identify its
2 experts and serve written reports as required by Rule 26(a)(2) on all other parties no later than
3 September 17, 2018. Each party shall also provide dates for which those experts can be
4 available for deposition.

5 Daubert Motions: Challenges to the admissibility of expert opinion testimony shall be
6 made by written motion and filed by November 15, 2018.

7 The remaining pretrial deadlines and trial dates remain unchanged.

8
9 **B. Grounds for Relief**

10 This motion is based upon the agreement and stipulation of the Parties. The current
11 deadline for expert disclosures is July 16, 2018. The current deadline for all motions related to
12 discovery is September 6, 2018. Good cause exists to extend the above-mentioned deadlines
13 pertaining to experts, because the parties agree additional time will serve the administration of
14 justice and will give the parties sufficient time to conduct certain fact discovery that would be
15 necessary in order to prepare any expert reports. The parties have exchanged written discovery
16 and are attempting to confer on outstanding disputes, as well as agree on dates for depositions
17 that have been requested by Plaintiff EEOC. The current deadline for discovery to be completed
18 is October 15, 2018. In addition, the parties have initiated informal settlement discussions. An
19 extension of the deadlines listed above will give the parties sufficient time to complete pretrial
20 matters in time for the February 4, 2019 trial date and to explore resolution at lesser expense
21 before the discovery and dispositive motion cutoff periods.
22

23 This is the first request for an extension of the case management deadlines in this matter.
24
25 The parties agree that the continuance of the above-mentioned deadlines will have no impact on

1 the trial date. The parties also agree that the extension of the above-mentioned deadlines will
2 not prejudice either party.

3
4 DATED this 11th day of June 2018.

5 Respectfully submitted,

6
7 ROBERTA STEELE
8 Regional Attorney

9 JOHN F. STANLEY
10 Supervisory Trial Attorney

11 MAY CHE
12 Senior Trial Attorney

13 BY: /s/ May Che
14 EQUAL EMPLOYMENT OPPORTUNITY
15 COMMISSION
16 909 First Avenue, Suite 400
17 Seattle, WA 98104-1061
18 Telephone (206) 220-6919
19 Facsimile (206) 220-6911

20 *Attorneys for Plaintiff EEOC*

21 BY: /s/ Tamsen Leachman
22 Tamsen Leachman
23 OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
24 The KOIN Center
25 222 SW Columbia Street, Suite 1500
Portland, OR 97201
Telephone (503) 552-2140
Facsimile (503) 224-4518
tamsen.leachman@ogletree.com

Attorneys for Defendant Jacksons Food Stores, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
CERTIFICATE OF SERVICE**

I hereby certify that on June 11, 2018, I electronically filed the forgoing
“STIPULATION TO MODIFY PRETRIAL DEADLINES PERTAINING TO EXPERTS” with
the Clerk of the court using the CM/ECF system which will send notification of such filing to
the following individuals listed below:

Tamsen Leachman
OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
The KOIN Center
222 SW Columbia Street, Suite 1500
Portland, OR 97201
Telephone (503) 552-2140
Facsimile (503) 224-4518
tamsen.leachman@ogletree.com

DATED this 11th day of June, 2018.

/s/ May Che
May Che
EEOC Senior Trial Attorney